

**From:** [O'Hara, Daniel P.](#)  
**To:** [Scott D. Simon](#); [Wheeler, Stephanie G.](#)  
**Cc:** [Mayberry, Keila M.](#); [Glueckstein, Brian D.](#)  
**Subject:** RE: Ross Rheingans-Yoo FDU designation  
**Date:** Friday, August 15, 2025 3:06:17 PM  
**Attachments:** [Manifold Markets Case Management Plan and Scheduling Order \(4907-2401-3151.3\).docx](#)

---

Scott,

The Court's July 9 order does not permit Rheingans-Yoo to substitute another charity for the one he originally designated. Moreover, it appears there is a potential conflict of interest in your representing Rheingans-Yoo and Manifold for Charity and conveying a settlement offer in which Rheingans-Yoo purports to be depriving Manifold for Charity of the potential to receive \$650,000.

The Trust will not withdraw either the amended complaint or the motion for reconsideration. We have attached a draft case management plan for the amended complaint. Please let us know if the draft is acceptable and if we may e-sign.

Thanks,  
Dan

**Daniel P. O'Hara**  
[+1 212 558 4294 \(T\)](#) | [+1 908 644 6682 \(M\)](#)

---

---

**From:** Scott D. Simon <[ssimon@goetzplatzer.com](mailto:ssimon@goetzplatzer.com)>  
**Sent:** Thursday, August 14, 2025 11:03 AM  
**To:** Wheeler, Stephanie G. <[WheelerS@sullcrom.com](mailto:WheelerS@sullcrom.com)>  
**Cc:** Mayberry, Keila M. <[mayberryk@sullcrom.com](mailto:mayberryk@sullcrom.com)>; Scott D. Simon <[ssimon@goetzplatzer.com](mailto:ssimon@goetzplatzer.com)>; Glueckstein, Brian D. <[gluecksteinb@sullcrom.com](mailto:gluecksteinb@sullcrom.com)>; O'Hara, Daniel P. <[oharad@sullcrom.com](mailto:oharad@sullcrom.com)>  
**Subject:** [EXTERNAL] Ross Rheingans-Yoo FDU designation

Stephanie,

The debtors' motion for reconsideration and amended adversary proceeding complaint take issue with Ross's selection of Manifold for Charity as the recipient of his allowed FDU claim. Having reviewed those pleadings, we believe the claims are not warranted by existing law and the factual contentions lack evidentiary support.

Moreover, upon information and belief the debtors have not directed their claims administrator to pay the FDU claim to Manifold for Charity. Neither the motion for reconsideration nor the amended adversary complaint sought or obtained a stay of the order allowing the FDU claim. The debtors are in default of the order.

Notwithstanding our opinion of the motion, amended complaint, and the debtors' default under the order, Ross is willing to eliminate the parties' ongoing litigation costs and conserve judicial resources by changing his designation from Manifold for Charity. Ross hereby designates a different Effective Altruism charity: 1DaySooner Inc., EIN 85-1103820.

As you are aware, 1Day Sooner received approximately \$400,000 in charitable transfers from the debtors. 1Day Sooner – voluntarily and unprompted by the debtors – reached out to return the funds in February 2023. The debtors accepted the return of those funds in December 2023.

Although the designation of an EA charity alone is sufficient to direct the grant, and without conceding that the debtors are entitled to do so, Ross is willing to answer written questions about 1Day Sooner to prospectively alleviate any concerns that the debtors may have about its philanthropy or relationship to Ross.

Please confirm by noon on Monday, August 18, 2025, that the debtors have accepted the changed beneficiary and will withdraw the motion to reconsider and dismiss the amended adversary complaint as to Ross.



**Scott D. Simon**

Partner

Goetz Platzer LLP

One Penn Plaza | Suite 3100 | NY, NY 10119

T 914.500.8737 | F 212.629.4013

[goetzplatzer.com](http://goetzplatzer.com) [[goetzfitz.com](http://goetzfitz.com)]

*The information in this transmission may be privileged and confidential. It is intended for the use of specific recipients.*

*In the event of an error, no waiver is intended, and we request that you notify the sender and destroy the original message.*

---

**\*\*This is an external message from: [ssimon@goetzplatzer.com](mailto:ssimon@goetzplatzer.com) \*\***

---

This e-mail is sent by a law firm and contains information that may be privileged and confidential. If you are not the intended recipient, please delete the e-mail and notify us immediately.